VINCENT A PEPPER
ROBERT F. CORAZZINI
PETER GUTMANN
JOHN F. GARZIGLIA
NEAL J. FRIEDMAN
ELLEN S. MANDELL
HOWARD J. BARR
MICHAEL J. LEHMKUHL *
SUZANNE C. SPINK *
RONALD G. LONDON *

* NOT ADMITTED IN D. C.

PEPPER & CORAZZINI
L. L. P.
ATTORNEYS AT LAW
1776 K STREET, NORTHWEST, SUITE 200
WASHINGTON, D. C. 20006

(202) 296-0600

GREGG P. SKALL
E. THEODORE MALLYCK
OF COUNSEL

FREDERICK W. FORD
1909-1986

TELECOPIER (202) 296-5572
INTERNET PEPCOR@COMMLAW.COM
WEB SITE HTTP://WWW.COMMLAW.COM

June 17, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Amendment of Section 73.202(b),
FM Table of Allotments
MM Docket No. 96-94; RM-8790
(Eufaula, Wagoner and Warner, Oklahoma)

Dear Mr. Caton:

Transmitted herewith on behalf of Music Sound Radio, Inc. is an original and four copies of its counterproposal supporting the substitution of Channel 272C2 for Channel 272A at Sand Springs, Oklahoma, and the modification of the license of KTFX(FM) to specify operation on Channel 272C2.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,

John F. Garziglia

Enclosure

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	MM Docket No. 96-94
	)	
Amendment of Section 73.202(b)	)	RM-8790
Table of Allotments	)	
FM Broadcast Stations	)	
(Eufaula, Warner and Wagoner, Oklahoma)	)	

To: Chief, Allocations Branch

COUNTERPROPOSAL

Music Sound Radio, Inc., by its attorneys, pursuant to Notice of Proposed Rule Making, DA 96-552, released April 25, 1996, hereby submits its Counterproposal, proposing the substitution of Channel 272C2 for Channel 272A at Sand Springs, Oklahoma, and the modification of the license of KTFX(FM), Sand Springs, Oklahoma to specify operation on Channel 272C2.[1/] In support of this Counterproposal, the following is submitted:

1. Music Sound Radio, Inc. proposes the allotment of Channel 272C2 to Sand Springs, Oklahoma as an upgrade for KTFX(FM). This proposed allotment is in direct conflict with the existing allotment of Channel 271A at Wagoner, Oklahoma. See Engineering Statement of Lawrence L. Morton Associates (attached). Therefore, this proposal for the upgrade of KTFX(FM) is acceptable as a counterproposal, as it is a proposal for an alternative and mutually exclusive allotment or set of allotments in the context of the proceeding in which the proposal is made.

1/ The coordinates for Channel 272C2 at Sand Springs, Oklahoma are 36° 12' 39" North Latitude, 96° 06' 03" West Longitude, the present transmitter site of KTFX(FM).

See Copeland, Kansas, 11 FCC Rcd 497 (1996); Implementation of BC Docket 80-90 to Increase the Availability of FM Broadcast Assignments, 5 FCC Rcd 931 (1990).[2/] Further, since the proposal of Music Sound Radio, Inc. introduces a new community other than proposed in the Notice of Proposed Rule Making, it should be regarded as a counterproposal. See Sioux City, Iowa, 9 FCC Rcd 7289 (1994); Clinton, Saint Pauls and Southern Pines, North Carolina and Chesterfield, South Carolina, 6 FCC Rcd 4370 (1991).

2. It is well settled that it is incumbent upon petitioners to raise potential upgrade concerns prior to the close of the initial comment period in proceedings in which such upgrades may be foreclosed. See Churubusco, Huntington, Roanoke and South Whitley, Indiana, 4 FCC Rcd 5045, 5046 (1989) ("It is incumbent upon a petitioner to raise potential upgrade concerns before the close of the initial comment date"). Because of this, Music Sound Radio, Inc. must file its proposal for an upgrade of

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2/ To the extent that Milton, West Virginia and Flemingsburg, Kentucky, DA 96-800, released June 4, 1996, suggests that the proposal for this KTFX(FM) upgrade is not a counterproposal, that decision is not applicable here. That decision may be distinguished upon its facts in that the proposal at issue which was found not to be a counterproposal proposed what were arguably "incompatible channel swaps". The Commission found in Milton, West Virginia and Flemingsburg, Kentucky that it would not be conducive to the efficient transaction of Commission business to delay resolution of the proceeding to determine whether the proposed channel upgrades were in fact "incompatible channel swaps" and, if necessary, afford interested parties the opportunity to express interest in applying for the upgraded allotments. In the case of this upgrade proposal, it is a proposal for an on-channel upgrade clearly covered by Section 1.420(g)(3) of the Commission's rules and thus entitles the petitioner to an upgrade without the acceptance of other expressions of interest on the mutually exclusive higher class co-channel.

KTFX(FM) in this proceeding, or not be heard to complain at a later date if the reallotment of Channel 271A from Wagoner to Warner, Oklahoma is not made. The failure of the Commission to move forward with its proposed reallotment of Channel 271A from Wagoner to Warner, Oklahoma would forever foreclose KTFX(FM) from obtaining an upgrade from Channel 272A to Channel 272C2.

3. Additionally, even where there are no technical conflicts between two requests but the proposals are interrelated, the Commission has accorded counterproposal status to an interrelated proposal. In Harrisburg and Albemarle, North Carolina, 7 FCC Rcd 108 (1992), the Commission found that if the grant or denial of one allotment would materially affect another proposal, then the two proposals should be considered simultaneously, even if there is no technical conflict. For administrative ease in Harrisburg and Albemarle, North Carolina, the Commission considered the new proposal as a counterproposal for the purpose of giving public notice and setting forth a response period. In this proceeding, if the Commission determines that Channel 271A should remain at Wagoner, Oklahoma, Music Sound Radio, Inc. will be unable to upgrade KTFX(FM). Accordingly, it is essential to a complete record that this upgrade proposal for KTFX(FM) be considered as a counterproposal in this proceeding based upon the public interest benefits that will accrue from a grant of the proposal.[3/]

3/ Under the Commission's one-step upgrade application rule [FM Channel and Class Modifications by Application, 8 FCC (continued...)

4. The upgrade of KTFX(FM) from Channel 272A to Channel 272C2 will provide great public interest benefits. As shown in the attached engineering statement, such an upgrade will encompass an additional 2,573 square miles (6,663 square kilometers) and allow KTFX(FM) to serve an additional 291,277 persons (1990 census population). This upgrade will result in a seventh service to 14 persons, an eighth service to 211 persons, a ninth service to 1,899 persons, a tenth service to 5,614 persons, and an eleventh service to 8,156 persons. It is well settled that such an upgrade is eminently in the public interest.

5. Accordingly, the proposal of Music Sound Radio, Inc. to substitute Channel 272C2 for Channel 272A at Sand Springs, Oklahoma and to modify the license of KTFX(FM) to specify operation on Channel 272C2 should be considered as a counterproposal in this proceeding and considered along with the other proposed allotment. Music Sound Radio, Inc. hereby states its present intention to apply for Channel 272C2 when allotted, and when authorized, to build its upgraded facility promptly.

3/(...continued)
Rcd 4735 (1993)], it is mandatory that the KTFX(FM) upgrade be filed as a counterproposal in this proceeding, since KTFX(FM) could not, by the filing of an application, propose the changes in the Table of Allotments being requested here allowing for an upgrade of KTFX(FM). If KTFX(FM) did not file its counterproposal at this time, which is the deadline for filing of comments and counterproposals to the proposed move of Channel 271A from Wagoner to Warner, Oklahoma, it would be foreclosed from ever raising the public interest benefits from such a proposed move in the future if the Commission was to deny the reallotment of Channel 271A to Warner. The comment date in this proceeding effectively cuts off any application that KTFX(FM) may in the future file seeking an upgrade if this proceeding does not reallot Channel 271A to Warner, Oklahoma.

WHEREFORE, for the reasons above, the substitution of Channel 272C2 for Channel 272A at Sand Springs, Oklahoma, and the modification of the license of KTFX(FM) to specify operation on Channel 272C2, is respectfully requested.

Respectfully submitted,

MUSIC SOUND RADIO, INC.

By: _____
John F. Garziglia
Its Attorney

Pepper & Corazzini, L.L.P.
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006
(202) 296-0600

June 17, 1996

ENGINEERING EXHIBITS IN SUPPORT OF COUNTERPROPOSAL TO NOTICE OF PROPOSED RULE MAKING

June 14, 1996

Music Sound Radio, Inc.
KTFX(FM) ▫ Channel 272A/C2
Sand Springs, Oklahoma
MM Docket No. 96-94

TELECOMMUNICATIONS ENGINEERS
LAWRENCE L. MORTON ASSOCIATES
1231 MESA OAKS LANE
MESA OAKS, CALIFORNIA 93436-2309
(805) 733-4275 / FAX (805) 733-4793

TABLE OF CONTENTS

EXHIBIT E-1
ENGINEERING STATEMENT

The information and data contained within these engineering exhibits were prepared on behalf of Music Sound Radio, Inc., licensee of FM broadcast station KTFX(FM), Channel 272A, Sand Springs, Oklahoma, FCC File No. BLH-890705KC, in support of a counterproposal to *Notice of Proposed Rule Making*, MM Docket No. 96-94, released April 25, 1996.

I. DISCUSSION

Adoption of the proposal of Tri-Mac Broadcasting to change the principal community of KRQZ-FM, Channel 271A, from Wagoner to Warner, Oklahoma, and grant of the pending one-step application of KCES(FM) at Eufaula, Oklahoma, from Channel 272A to 273C3, will permit the licensee's station KTFX(FM) to upgrade from Channel 272A to Channel 272C2 at its presently-licensed site. Thus, Music Sound Radio, Inc., supports the allotment of Channel 271A to Warner, Oklahoma, MM Docket No. 96-94.

II. CHANNEL 272C2 SPACING STUDY AT SAND SPRINGS

The following table shows a listing of nearest allocation-pertinent assignments and allotments currently on file with the required distance separations for channels pertinent to the allotment of Channel 272C2 at Sand Springs, Oklahoma. For clarity, facilities that are greater than 350 kilometers beyond the minimum required separations are not shown.

All distances were computed by the methods outlined in § 73.208(c) of the Commission's Rules and fully-spaced distances were rounded to the nearest kilometer according to § 73.208(c)(8).

ALLOCATION-PERTINENT STATIONS AND SPACING REQUIREMENTS OF § 73.207

CALL LETTERS	CHANNEL /CLASS	NORTH LATITUDE	WEST LONGITUDE	ACTUAL DISTANCE	REQUIRED DISTANCE
KVAZ	218-A	35° 21' 56"	96° 00' 34"	94. Km	15. Km
KANU	218-C1	38° 57' 14"	95° 16' 11"	313	27
KOSU-FM	219-C	36° 06' 31"	97° 11' 46"	99	35
KEOK	269-C3	35° 53' 43"	94° 57' 12"	109	56
KDVE-FM	269-C1	33° 41' 39"	96° 34' 38"	283	79
KREJ	269-C2	37° 15' 37"	98° 54' 44"	277	58
KTST	270-C	35° 32' 58"	97° 29' 50"	146	105
KZSN-FM	271-C	37° 47' 47"	97° 31' 59"	217	188

CALL LETTERS	CHANNEL /CLASS	NORTH LATITUDE	WEST LONGITUDE	ACTUAL DISTANCE	REQUIRED DISTANCE
KRQZ-FM[1]	271-A	35° 33' 27"	95° 14' 41"	106	106
KRQZ-FM[2]	271-A	35° 56' 44"	95° 24' 35"	68.86	106
KCES[3]	272-A	35° 22' 25"	95° 34' 00"	104.69	166
KTFX[4]	272-A	36° 12' 39"	96° 06' 03"	0.00	166
KQMC-FM	272-C2	34° 58' 10"	90° 51' 07"	494	190
KMAD-FM	272-A	34° 06' 24"	96° 46' 30"	241	166
KCJC	272-C3	35° 13' 41"	93° 15' 20"	280	177
NEW	273-A	37° 05' 01"	96° 55' 46"	122	106
KJKT	273-C1	37° 04' 43"	94° 32' 26"	170	158
KCES[5]	273-C3	35° 08' 06"	95° 31' 00"	131	117
KJYO	274-C	35° 32' 52"	97° 29' 29"	146	105
ALLOC	275-A	37° 15' 42"	95° 45' 59"	120	55
KDMX	275-C	32° 34' 54"	96° 58' 32"	411	105
KHOZ-FM	275-C1	36° 26' 11"	93° 14' 43"	258	79

III. GAIN AREA

Exhibit E-2 is a map showing the KTFX(FM) licensed Class A 60 dBμ service contour at Sand Springs, and the 60 dBμ contour from a hypothetical Class C2 facility at the same site. As a result of an upgrade from Class A to C2 facilities the KTFX(FM) 60 dBμ service contour would encompass an additional 6,663 square kilometers with a 1990 U.S. Census population of 291,277 persons.

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[1] KRQZ-FM proposed Channel 271A facility at Warner, Oklahoma.

[2] Licensed KRQZ-FM Channel 271A facility at Wagoner, Oklahoma. This allotment is proposed to be moved to Warner, Oklahoma, MM Docket No. 96-94.

[3] Licensed KCES(FM) Channel 272A facility at Eufaula. This facility has filed a one-step upgrade application, FCC File No. BPH-960319ID, to Channel 273C3 at Eufaula.

[4] KTFX(FM) licensed Channel 272A facility at Sand Springs, Oklahoma.

[5] Proposed one-step application of KCES(FM), FCC File No. BPH-960319ID, to change from Channel 272A to Channel 273C3 at Eufaula, Oklahoma.

A study was conducted to determine the number of existing aural services within the proposed KTFX(FM) Class C2 gain area. The maps of exhibits E-3 and E-4A through E-4E show the results of this study.

For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals starting with True North were extracted from the computerized thirty-second point elevation database version of ***Elevation Data for North America***, available from the Department of Commerce, National Geophysical Data Center, National Oceanic and Atmospheric Administration. A total of 161 points along each radial were linearly interpolated according to § 73.312(d).

The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

The locations of the 60 dBμ F(50,50) service contours were calculated according to the computer methods outlined in F.C.C. publication PB-249144, ***Field Strength Calculations for TV And FM Broadcasting***. The computer methods use digitized data taken directly from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

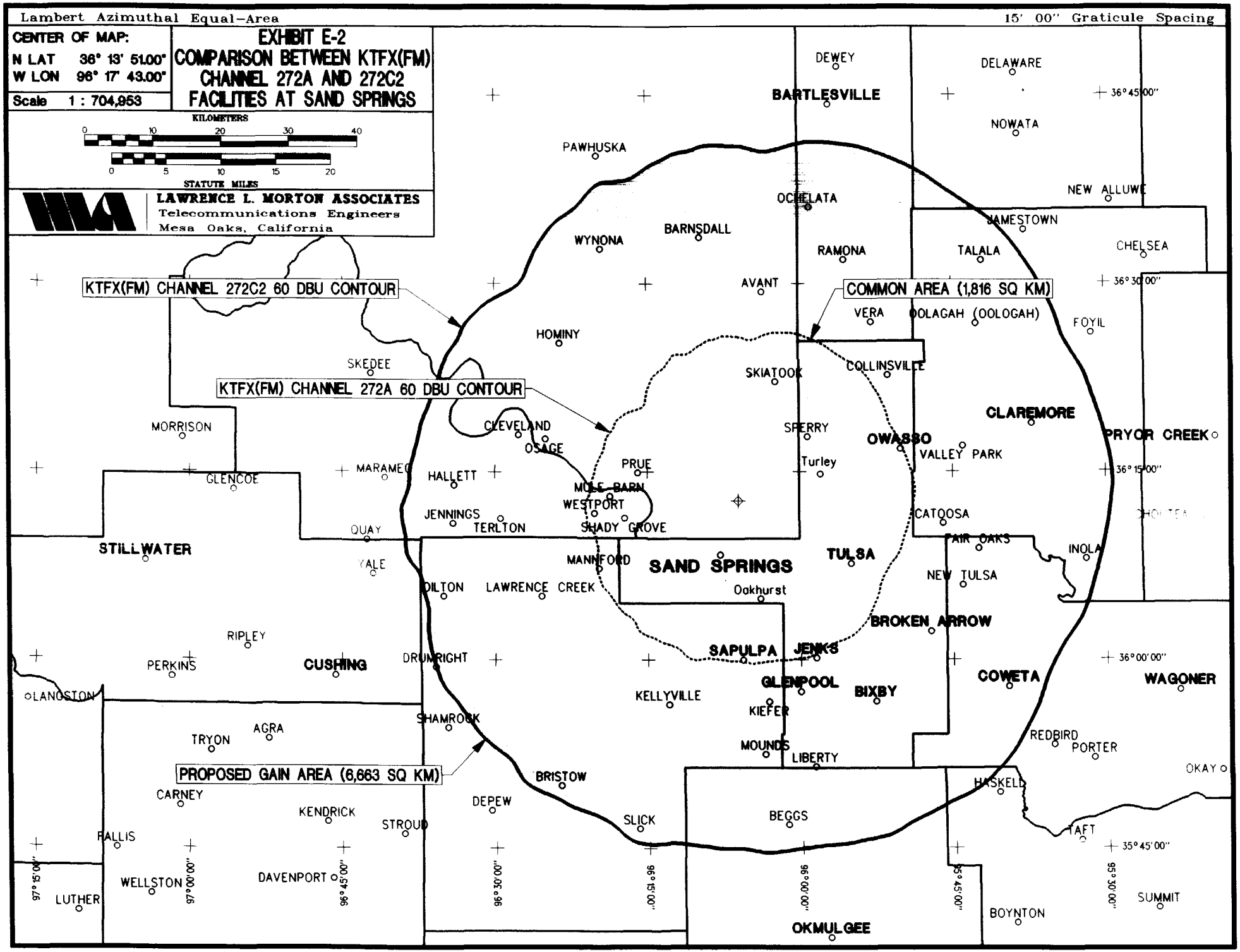
Pursuant to established Commission policy, full-time AM reception service is defined by the station's nighttime interference-free contour for non-Class A stations, and by the 0.5 mV/m groundwave contour for Class A stations. Nighttime interference studies were performed for all full-time AM facilities within the vicinity of the KTFX(FM) 60 dBμ contour to determine those AM stations that provide nighttime interference-free service to the area.

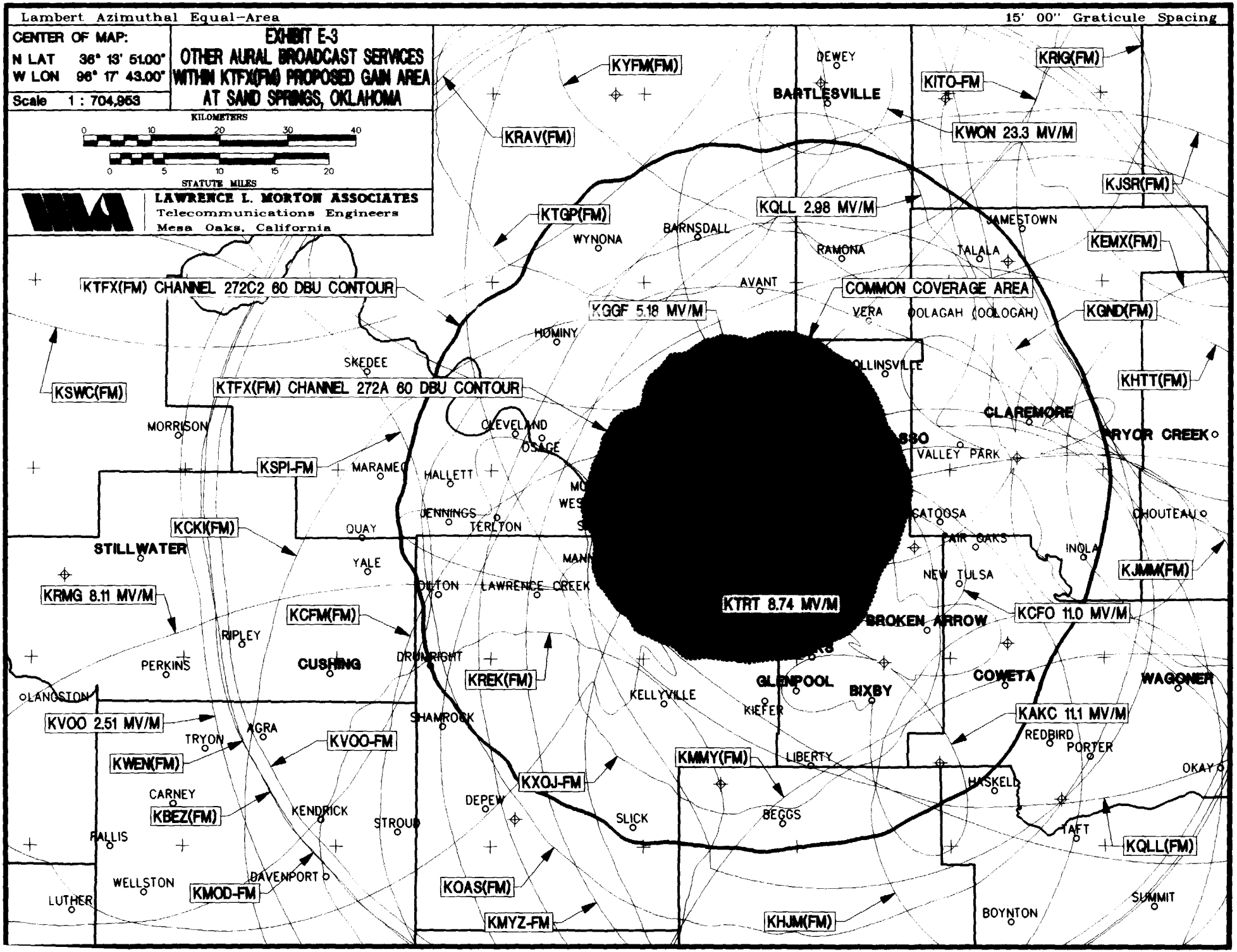
Also studied were the 60 dBμ contours of all FM stations in the area to determine those that provide some existing service to the gain area within the region outside of the KTFX(FM) Class A service contour and within the KTFX(FM) Class C2 contour. For non-Class C FM stations operating at less than maximum facilities, technical parameters were based on maximum facilities for the class of station under study. In the case of Class C stations, either the actual operating parameters or a minimum 300-meter height above average terrain and 100-kW effective radiated power was assumed, whichever is greater. Exhibit E-7 is a tabulation of the stations that provide existing aural broadcast reception within the proposed gain area of the KTFX(FM) Class C2 facility at Sand Springs.

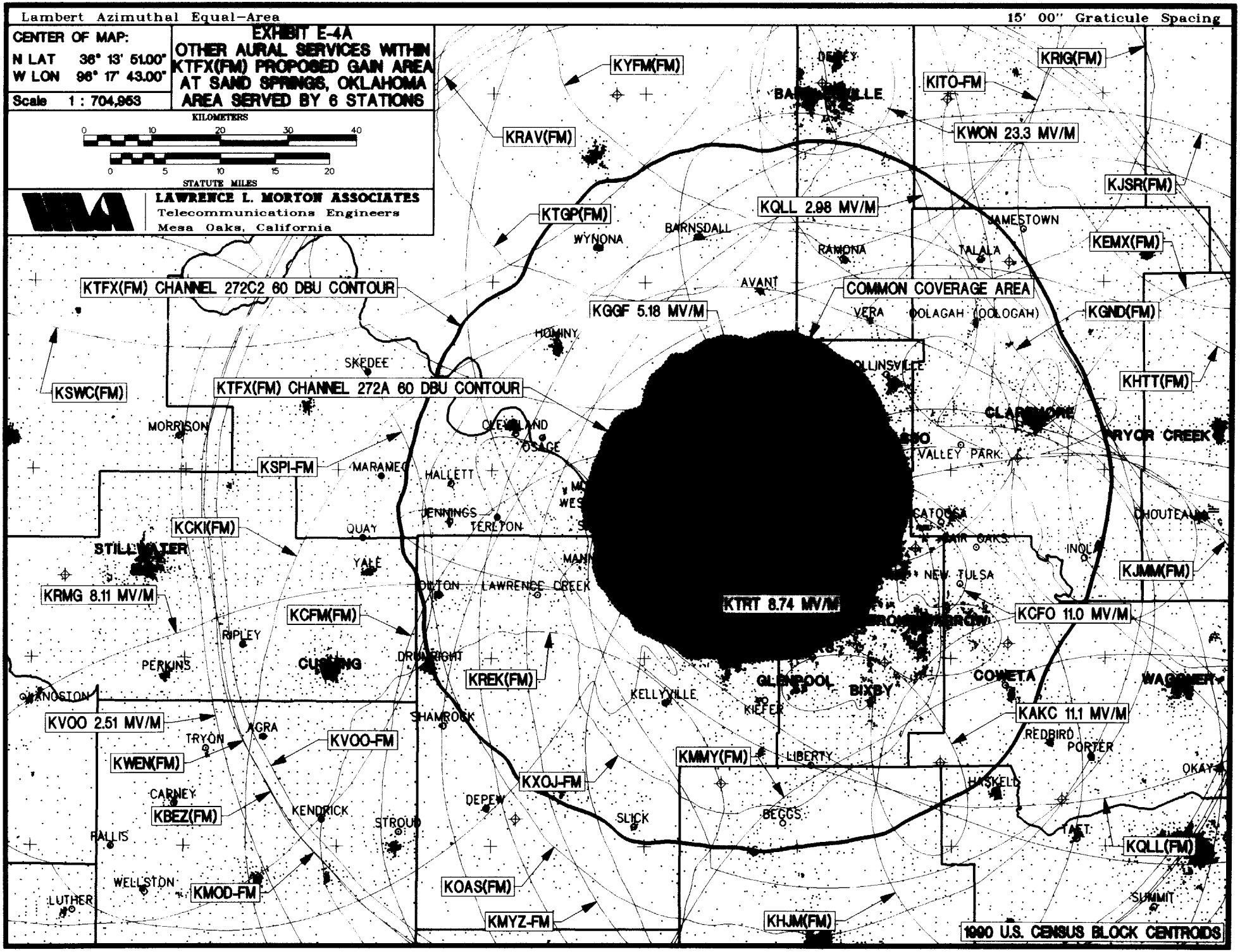
Exhibit E-3 shows the KTFX(FM) service contours from the Class A and Class C2 facilities, and the service contours of the AM and FM stations that provide existing aural service within the proposed gain area. Exhibits E-4A through E-4E are "spaghetti" maps showing the regions within the KTFX(FM) service contour gain area that already receive from six to ten-plus aural reception services. Each level of service is shaded in yellow and corresponds to the number of services shown in the title block. Shown as violet dots are the locations of the 1990 U.S. Census block centroids. Exhibit E-6 tabulates these data and indicates the land areas and populations within the identified gain regions.

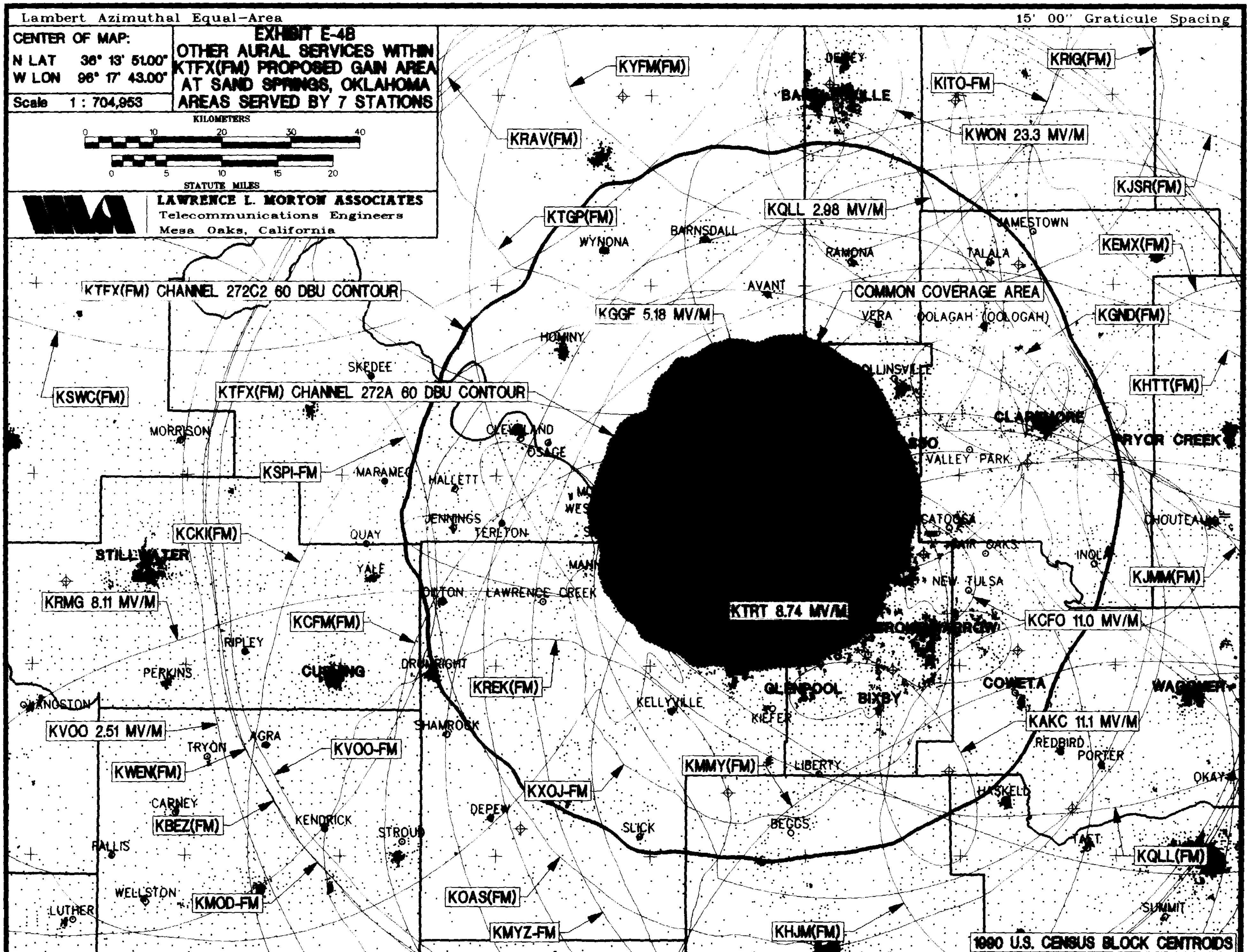
The results of this study indicate that the proposed upgrade to KTFX(FM) from Channel 272A to 272C2 *will result in a seventh service to 14 persons, an eighth service to 211 persons, a ninth service to 1,899 persons, a tenth service to 5,614 and an eleventh service to 8,156 persons.*

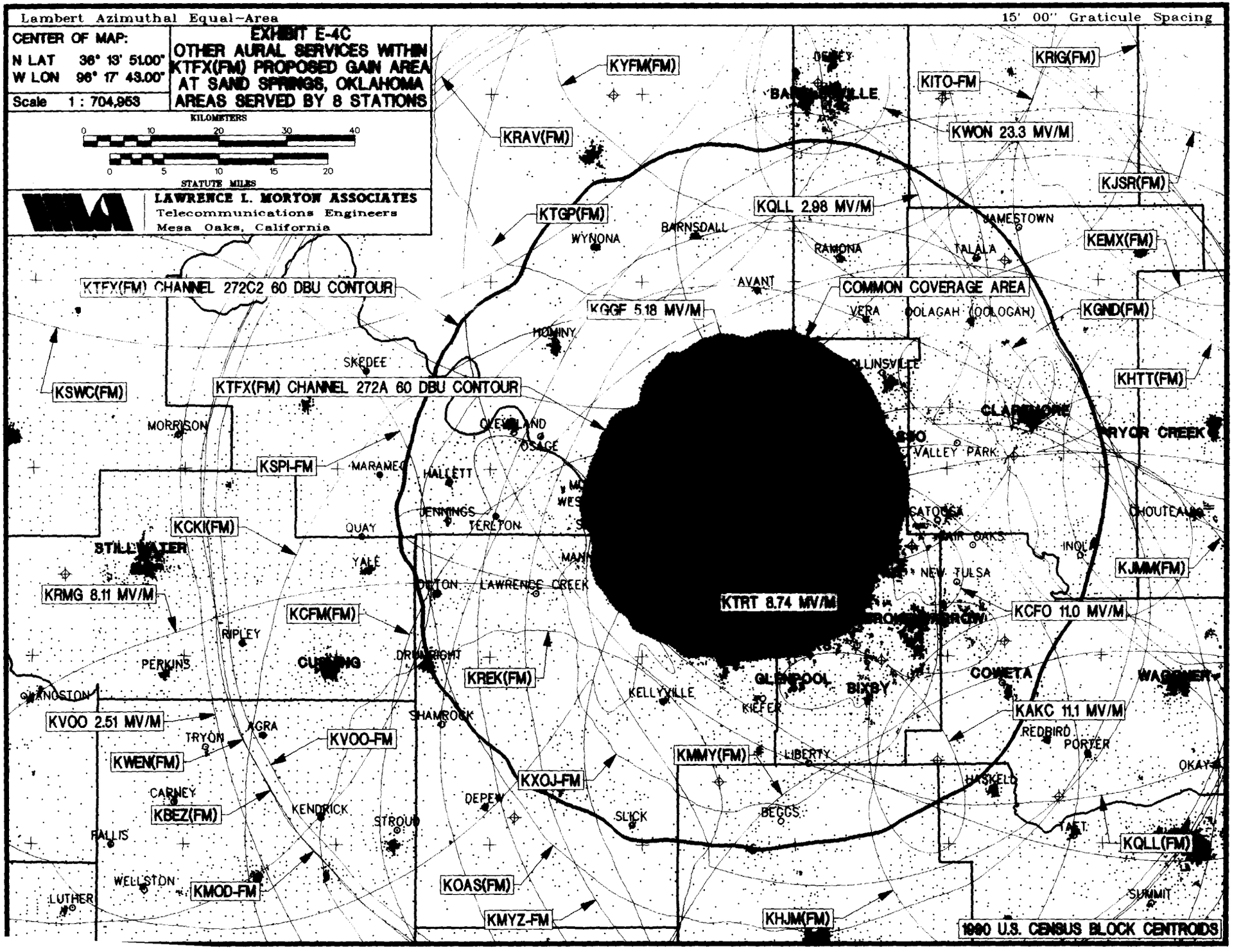
Lawrence L. Morton, P.E.
Consulting Engineer to Music Sound Radio, Inc.
June 14, 1996

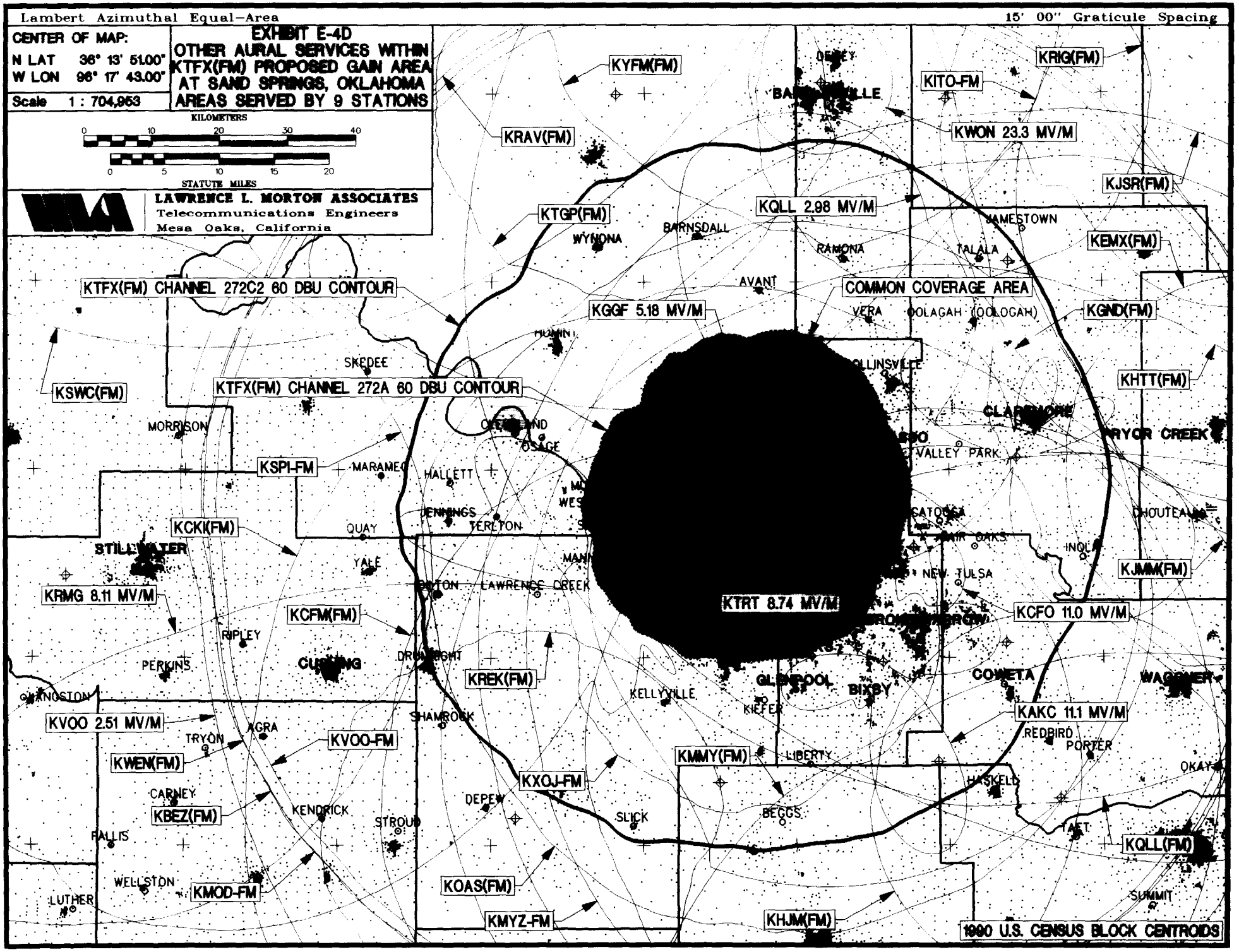

Lambert Azimuthal Equal-Area
15' 00" Graticule Spacing
CENTER OF MAP:
N LAT 36° 13' 51.00"
W LON 96° 17' 43.00"
Scale 1 : 704,953
EXHIBIT E-2
COMPARISON BETWEEN KTFX(FM) CHANNEL 272A AND 272C2 FACILITIES AT SAND SPRINGS
KILOMETERS
0 10 20 30 40
0 5 10 15 20
STATUTE MILES
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California
KTFX(FM) CHANNEL 272C2 60 DBU CONTOUR
KTFX(FM) CHANNEL 272A 60 DBU CONTOUR
COMMON AREA (1,816 SQ KM)
PROPOSED GAIN AREA (6,663 SQ KM)
DEWEY
BARTLESVILLE
DELAWARE
NOWATA
PAWHUSKA
OCHELATA
NEW ALLUWE
JAMESTOWN
WYNONA
BARNSDALL
RAMONA
TALALA
CHELSEA
AVANT
VERA
OOLAGAH (OOLOGAH)
FOYIL
HOMINY
SKEDEE
SKIATOOK
COLLINSVILLE
CLAREMORE
MORRISON
CLEVELAND
OSAGE
SPERRY
OWASSO
PRYOR CREEK
VALLEY PARK
GLENCOE
MARAMEC
HALLETT
PRUE
Turley
MULE BARN
WESTPORT
JENNINGS
TERLTON
SHADY GROVE
CATOOSA
QUAY
STILLWATER
YALE
MANNFORD
SAND SPRINGS
TULSA
FAIR OAKS
INOLA
NEW TULSA
DILTON
LAWRENCE CREEK
Oakhurst
BROKEN ARROW
RIPLEY
PERKINS
CUSHING
DRUMRIGHT
SAPULPA
JENKS
COWETA
WAGONER
LANGSTON
GLENPOOL
BIXBY
KELLYVILLE
KIEFER
SHAMROCK
AGRA
TRYON
REDBIRD
PORTER
MOUNDS
LIBERTY
OKAY
BRISTOW
HASKELL
CARNEY
KENDRICK
DEPEW
STROUD
SLICK
BEGGS
TAFT
RALLIS
WELLSTON
DAVENPORT
LUTHER
BOYNTON
SUMMIT
OKMULGEE
36°45'00"
36°30'00"
36°15'00"
36°00'00"
35°45'00"
97°15'00"
97°00'00"
96°45'00"
96°30'00"
96°15'00"
96°00'00"
95°45'00"
95°30'00"


Lambert Azimuthal Equal-Area
15' 00" Graticule Spacing
CENTER OF MAP:
N LAT 36° 13' 51.00"
W LON 96° 17' 43.00"
Scale 1 : 704,953
EXHIBIT E-3
OTHER AURAL BROADCAST SERVICES
WITHIN KTFX(FM) PROPOSED GAIN AREA
AT SAND SPRINGS, OKLAHOMA
KILOMETERS
0 10 20 30 40
STATUTE MILES
0 5 10 15 20
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California
KTFX(FM) CHANNEL 272C2 60 DBU CONTOUR
KTFX(FM) CHANNEL 272A 60 DBU CONTOUR
COMMON COVERAGE AREA
KTRT 8.74 MV/M
KGGF 5.18 MV/M
KQLL 2.98 MV/M
KWON 23.3 MV/M
KYFM(FM)
KRAV(FM)
KRIG(FM)
KITO-FM
KJSR(FM)
KTGP(FM)
KEMX(FM)
KGND(FM)
KHTT(FM)
KSWC(FM)
KSPI-FM
KCKK(FM)
KRMG 8.11 MV/M
KCFM(FM)
KREK(FM)
KVOO 2.51 MV/M
KVOO-FM
KWEN(FM)
KBEZ(FM)
KMOD-FM
KOAS(FM)
KMYZ-FM
KXOJ-FM
KMMY(FM)
KHJM(FM)
KCFO 11.0 MV/M
KAKC 11.1 MV/M
KJMM(FM)
KQLL(FM)
BARTLESVILLE
CLAREMORE
PRYOR CREEK
BROKEN ARROW
COWETA
WAGONER
GLENPOOL
BIXBY
STILLWATER
CUSHING
DEWEY
BARNSDALL
WYNONA
RAMONA
JAMESTOWN
TALALA
AVANT
VERA
OOLAGAH (OOLOGAH)
HOMINY
SKEDEE
MORRISON
CLEVELAND
OSAGE
VALLEY PARK
CATOOSA
CHOUTEAU
INOLA
FAIR OAKS
NEW TULSA
MARAMEC
HALLETT
JENNINGS
TERLTON
QUAY
YALE
LAWRENCE CREEK
RIPLEY
PERKINS
DRUMRIGHT
KELLYVILLE
KIEFER
SHAMROCK
TRYON
AGRA
CARNEY
KENDRICK
STROUD
DEPEW
SLICK
BEGGS
LIBERTY
REDBIRD
PORTER
HASKELL
TAFT
OKAY
SUMMIT
BOYNTON
WELLSTON
DAVENPORT
LUTHER
PALLIS
LANGSTON


Lambert Azimuthal Equal-Area
15' 00" Graticule Spacing
CENTER OF MAP:
N LAT 36° 13' 51.00"
W LON 96° 17' 43.00"
Scale 1 : 704,963
EXHIBIT E-4A
OTHER AURAL SERVICES WITHIN
KTFX(FM) PROPOSED GAIN AREA
AT SAND SPRINGS, OKLAHOMA
AREA SERVED BY 6 STATIONS
KILOMETERS
0 10 20 30 40
0 5 10 15 20
STATUTE MILES
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California
KYFM(FM)
KRAV(FM)
KRIG(FM)
KITO-FM
KWON 23.3 MV/M
KJSR(FM)
KQLL 2.98 MV/M
KTGP(FM)
KEMX(FM)
KTFX(FM) CHANNEL 272C2 60 DBU CONTOUR
COMMON COVERAGE AREA
KGGF 5.18 MV/M
KGND(FM)
KTFX(FM) CHANNEL 272A 60 DBU CONTOUR
KSWC(FM)
KHTT(FM)
KSPI-FM
KCKI(FM)
KRMG 8.11 MV/M
KTRT 8.74 MV/M
KJMM(FM)
KCFM(FM)
KCFO 11.0 MV/M
KREK(FM)
KAKC 11.1 MV/M
KVOO 2.51 MV/M
KVOO-FM
KWEN(FM)
KMMY(FM)
KXOJ-FM
KBEZ(FM)
KQLL(FM)
KOAS(FM)
KMOD-FM
KMYZ-FM
KHJM(FM)
1990 U.S. CENSUS BLOCK CENTROIDS


Lambert Azimuthal Equal-Area
15' 00" Graticule Spacing
CENTER OF MAP:
N LAT 36° 13' 51.00"
W LON 96° 17' 43.00"
Scale 1 : 704,953
EXHIBIT E-4B
OTHER AURAL SERVICES WITHIN KTFX(FM) PROPOSED GAIN AREA AT SAND SPRINGS, OKLAHOMA
AREAS SERVED BY 7 STATIONS
KILOMETERS
0 10 20 30 40
0 5 10 15 20
STATUTE MILES
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California
KYFM(FM)
KRIG(FM)
KITO-FM
KWON 23.3 MV/M
KRAV(FM)
KJSR(FM)
KQLL 2.98 MV/M
KTGP(FM)
KEMX(FM)
KTFX(FM) CHANNEL 272C2 60 DBU CONTOUR
COMMON COVERAGE AREA
KGGF 5.18 MV/M
KGND(FM)
KSWC(FM)
KTFX(FM) CHANNEL 272A 60 DBU CONTOUR
KHTT(FM)
KSPI-FM
KCKI(FM)
KJMM(FM)
KRMG 8.11 MV/M
KTRT 8.74 MV/M
KCFO 11.0 MV/M
KCFM(FM)
KREK(FM)
KAKC 11.1 MV/M
KVOO 2.51 MV/M
KVOO-FM
KWEN(FM)
KMMY(FM)
KXOJ-FM
KBEZ(FM)
KQLL(FM)
KMOD-FM
KOAS(FM)
KMYZ-FM
KHJM(FM)
1990 U.S. CENSUS BLOCK CENTROIDS
DEWEY
WYNONA
BARNSDALL
RAMONA
JAMESTOWN
TALALA
AVANT
VERA
OOLAGAH (OOLOGAH)
HOMINY
SKEDEE
MORRISON
CLEVELAND
OSAGE
VALLEY PARK
MARAMEC
HALLETT
JENNINGS
TERLTON
QUAY
CATOOSA
CHOUTEAU
YALE
INOLA
NEW TULSA
LAWRENCE CREEK
RIPLEY
PERKINS
KELLYVILLE
GLENPOOL
BIXBY
COWETA
SHAMROCK
KIEFER
REDBIRD
PORTER
TRYON
AGRA
LIBERTY
OKAY
CARNEY
HASKELL
DEPEW
KENDRICK
STROUD
BEGGS
SLICK
FALLIS
WELLSTON
LUTHER
SUMMIT


Lambert Azimuthal Equal-Area
15' 00" Graticule Spacing
CENTER OF MAP:
N LAT 36° 13' 51.00"
W LON 96° 17' 43.00"
Scale 1 : 704,953
EXHIBIT E-4C
OTHER AURAL SERVICES WITHIN
KTFX(FM) PROPOSED GAIN AREA
AT SAND SPRINGS, OKLAHOMA
AREAS SERVED BY 8 STATIONS
KILOMETERS
0 10 20 30 40
0 5 10 15 20
STATUTE MILES
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California
KYFM(FM)
KRAV(FM)
KRIG(FM)
KITO-FM
KWON 23.3 MV/M
KJSR(FM)
KQLL 2.98 MV/M
KTGP(FM)
KEMX(FM)
KTFY(FM) CHANNEL 272C2 60 DBU CONTOUR
KGGF 5.18 MV/M
COMMON COVERAGE AREA
KGND(FM)
KSWC(FM)
KTFX(FM) CHANNEL 272A 60 DBU CONTOUR
KHTT(FM)
KSPI-FM
KCK(FM)
KRMG 8.11 MV/M
KCFM(FM)
KTRT 8.74 MV/M
KCFO 11.0 MV/M
KJMM(FM)
KREK(FM)
KVOO 2.51 MV/M
KVOO-FM
KWEN(FM)
KAKC 11.1 MV/M
KMMY(FM)
KXOJ-FM
KBEZ(FM)
KOAS(FM)
KMOD-FM
KMYZ-FM
KHJM(FM)
KQLL(FM)
1990 U.S. CENSUS BLOCK CENTROIDS


Lambert Azimuthal Equal-Area
15' 00" Graticule Spacing
CENTER OF MAP:
N LAT 36° 13' 51.00"
W LON 96° 17' 43.00"
Scale 1 : 704,963
EXHIBIT E-4D
OTHER AURAL SERVICES WITHIN
KTFX(FM) PROPOSED GAIN AREA
AT SAND SPRINGS, OKLAHOMA
AREAS SERVED BY 9 STATIONS
KILOMETERS
0 10 20 30 40
0 5 10 15 20
STATUTE MILES
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California
KYFM(FM)
KRAV(FM)
KTGP(FM)
KRIG(FM)
KITO-FM
KWON 23.3 MV/M
KJSR(FM)
KQLL 2.98 MV/M
KEMX(FM)
KTFX(FM) CHANNEL 272C2 60 DBU CONTOUR
KGGF 5.18 MV/M
COMMON COVERAGE AREA
KGND(FM)
KSWC(FM)
KTFX(FM) CHANNEL 272A 60 DBU CONTOUR
KHTT(FM)
KSPI-FM
KCK(FM)
KRMG 8.11 MV/M
KCFM(FM)
KTRT 8.74 MV/M
KCFO 11.0 MV/M
KJMM(FM)
KREK(FM)
KVOO 2.51 MV/M
KVOO-FM
KWEN(FM)
KAKC 11.1 MV/M
KMMY(FM)
KXOJ-FM
KBEZ(FM)
KOAS(FM)
KMOD-FM
KMYZ-FM
KHJM(FM)
KQLL(FM)
1990 U.S. CENSUS BLOCK CENTROIDS
BARNSDALL
WYNONA
RAMONA
JAMESTOWN
TALALA
AVANT
VERA
OOLAGAH (OOLOGAH)
SKEDEE
MORRISON
CLEVELAND
OSAGE
CLAREMORE
VALLEY PARK
MARAMEC
HALLETT
JENNINGS
TERLTON
QUAY
CATOOSA
CHOUTEAU
AIR OAKS
INOLA
STILLWATER
YALE
LAWRENCE CREEK
NEW TULSA
RIPLEY
PERKINS
CUSHING
DRUMRIGHT
GLENPOOL
BIXBY
COWETA
WAGONER
KELLYVILLE
KIEFER
REDBIRD
PORTER
OKAY
SHAMROCK
TRYON
AGRA
LIBERTY
HASKELL
CARNEY
KENDRICK
DEPEW
SLICK
BEGGS
TAFT
STROUD
PAWNEE
WELLSTON
LUTHER
SUMMIT

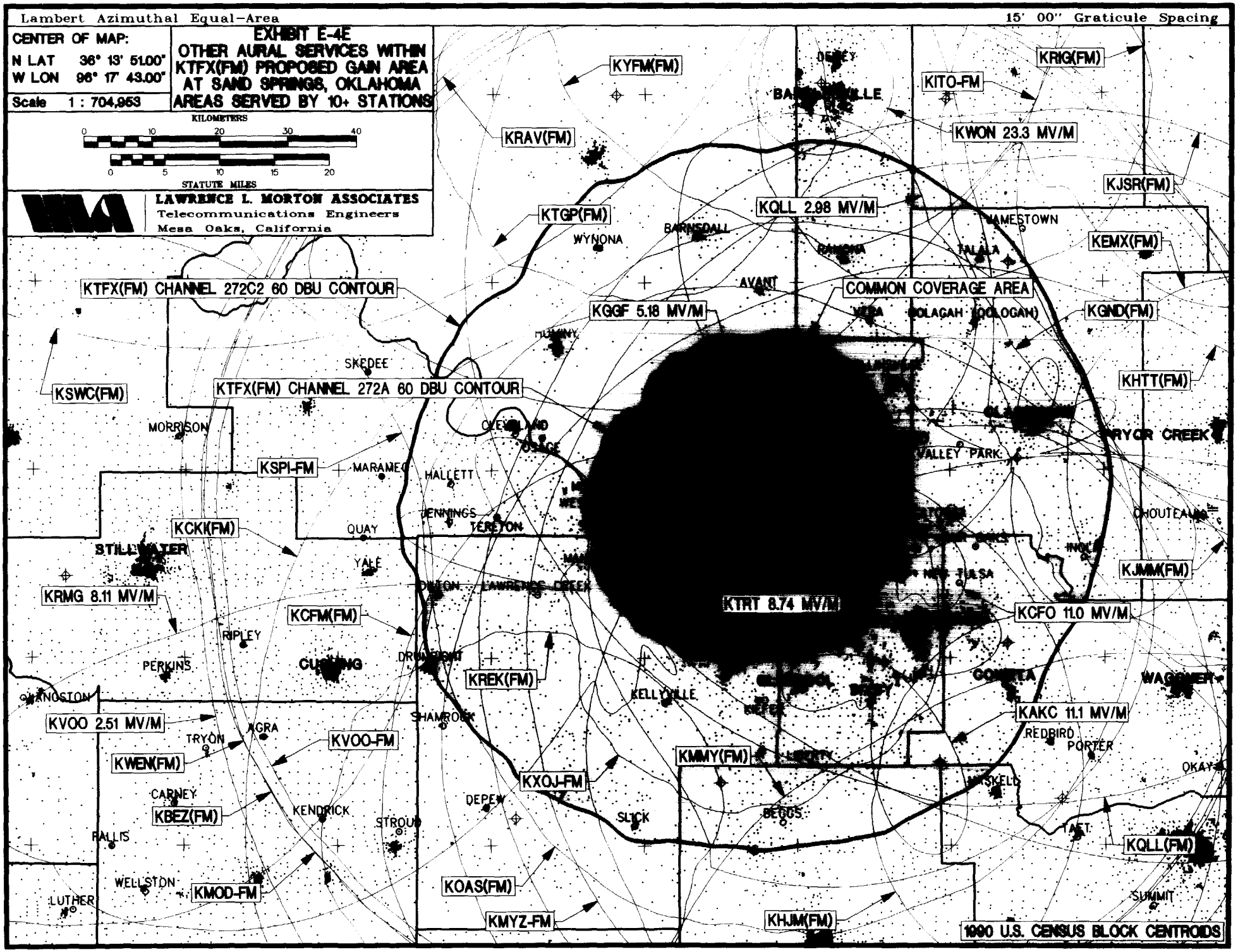

Lambert Azimuthal Equal-Area
15' 00" Graticule Spacing
CENTER OF MAP:
N LAT 36° 13' 51.00"
W LON 96° 17' 43.00"
Scale 1 : 704,953
EXHIBIT E-4E
OTHER AURAL SERVICES WITHIN
KTFX(FM) PROPOSED GAIN AREA
AT SAND SPRINGS, OKLAHOMA
AREAS SERVED BY 10+ STATIONS
KILOMETERS
0 10 20 30 40
0 5 10 15 20
STATUTE MILES
LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California
KYFM(FM)
KRAV(FM)
KRIG(FM)
KITO-FM
KWON 23.3 MV/M
KJSR(FM)
KTGP(FM)
KQLL 2.98 MV/M
KEMX(FM)
KTFX(FM) CHANNEL 272C2 60 DBU CONTOUR
KGGF 5.18 MV/M
COMMON COVERAGE AREA
KGND(FM)
KTFX(FM) CHANNEL 272A 60 DBU CONTOUR
KSWC(FM)
KHTT(FM)
KSPI-FM
KCKI(FM)
KRMG 8.11 MV/M
KTRT 8.74 MV/M
KJMM(FM)
KCFO 11.0 MV/M
KCFM(FM)
KREK(FM)
KAKC 11.1 MV/M
KVOO 2.51 MV/M
KVOO-FM
KWEN(FM)
KMMY(FM)
KXOJ-FM
KBEZ(FM)
KOAS(FM)
KQLL(FM)
KMOD-FM
KMYZ-FM
KHJM(FM)
1990 U.S. CENSUS BLOCK CENTROIDS
BARTLESVILLE
WYNONA
BARNSDALL
AVANT
SKEDEE
MORRISON
MARAMEC
HALLETT
JENNINGS
TERETON
QUAY
YALE
PERKINS
RIPLEY
DRUMRIGHT
KELLYVILLE
SHAMROCK
TRYON
AGRA
CARNEY
KENDRICK
STROUD
DEPEW
SLICK
BEGGS
RALLIS
WELLSTON
LUTHER
JAMESTOWN
RAMONA
TALALA
VERA
OOLAGAH (OOLOGAH)
TULSA
VALLEY PARK
PRYOR CREEK
CHOUTEAU
REDBIRD
PORTER
OKAY
TAFT
SUMMIT

EXHIBIT E-5
STATIONS PROVIDING OTHER AURAL SERVICES WITHIN KTFX(FM) PROPOSED GAIN AREA

Music Sound Radio, Inc.
June 1996

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	KHJM(FM)	Taft	OK	100.3 MHz
2	KMOD-FM	Tulsa	OK	97.5
3	KSPI-FM	Stillwater	OK	93.7
4	KITO-FM	Vinita	OK	96.1
5	KJSR(FM)	Tulsa	OK	103.3
6	KREK(FM)	Bristow	OK	104.9
7	KVOO-FM	Tulsa	OK	98.5
8	KXOJ-FM	Sapulpa	OK	100.9
9	KQLL(FM)	Owasso	OK	106.1
10	KEMX(FM)	Locust Grove	OK	94.5
11	KSWC(FM)	Winfield	KS	100.3
12	KGND(FM)	Ketchum	OK	107.5
13	KCFM(FM)	Okmulgee	OK	94.1
14	KMYZ-FM	Pryor	OK	104.5
15	KJMM(FM)	Bixby	OK	105.3
16	KWEN(FM)	Tulsa	OK	95.5
17	KTGP(FM)	Pawhuska	OK	103.9
18	KCKI(FM)	Henryetta	OK	99.5
19	KMMY(FM)	Muskogee	OK	97.1
20	KRAV(FM)	Tulsa	OK	96.5
21	KBEZ(FM)	Tulsa	OK	92.9
22	KOAS(FM)	Broken Arrow	OK	92.1
23	KHTT(FM)	Muskogee	OK	106.9
24	KYFM(FM)	Bartlesville	OK	99.9
25	KRIG(FM)	Nowata	OK	94.3
26	KGGF	Coffeyville	KS	690. kHz
27	KRMG	Tulsa	OK	740
28	KCFO	Tulsa	OK	970
29	KVOO	Tulsa	OK	1170
30	KTRT	Claremore	OK	1270
31	KAKC	Tulsa	OK	1300
32	KWON	Bartlesville	OK	1400
33	KQLL	Tulsa	OK	1430

EXHIBIT E-6
OTHER AURAL SERVICES WITHIN KTFX(FM)
PROPOSED GAIN AREA AT SAND SPRINGS

Music Sound Radio, Inc.
June 1996

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF GAIN AREA	1990 CENSUS POPULATION	% OF GAIN AREA
0	0.00	0.00	0.00	0	0.00
1	0.00	0.00	0.00	0	0.00
2	0.00	0.00	0.00	0	0.00
3	0.00	0.00	0.00	0	0.00
4	0.00	0.00	0.00	0	0.00
5	0.00	0.00	0.00	0	0.00
6	3.55	1.37	0.05	14	0.00
7	99.86	38.56	1.50	211	0.07
8	267.65	103.34	4.02	1,899	0.65
9	425.52	164.29	6.39	5,614	1.93
10	418.69	161.66	6.28	8,156	2.80
11	563.05	217.40	8.45	6,633	2.28
12	775.11	299.27	11.63	14,868	5.10
13	944.10	364.52	14.17	22,213	7.63
14	708.81	273.67	10.64	15,770	5.41
15	648.82	250.51	9.74	13,966	4.79
16	652.25	251.83	9.79	14,835	5.09
17	456.42	176.22	6.85	39,773	13.65
18	483.36	186.62	7.25	96,005	32.96
19	208.90	80.66	3.14	50,075	17.19
20	6.97	2.69	0.10	1,245	0.43
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
TOTALS:	6,663.06	2,572.62	100.0 %	291,277	100.0 %

EXHIBIT E-7A
1990 U.S. CENSUS DEMOGRAPHICS
WITHIN KTFX(FM) CLASS A 60 dBμ SERVICE CONTOUR

Music Sound Radio, Inc.
Sand Springs, Oklahoma
June 1996

DEMOGRAPHICS	POPULATION WITHIN 60 dBμ CONTOUR	
	TOTAL	PERSONS 18+ YEARS
TOTAL POPULATION	388,516	292,883
RACE		
White	310,861	241,584
Black	49,075	32,270
American Indian, Eskimo or Aleutian	21,569	14,281
Asian or Pacific Islander	3,571	2,510
Other	3,440	2,238
HISPANIC ORIGIN AND RACE		
Hispanic	8,817	5,685
NOT OF HISPANIC ORIGIN		
White	306,375	238,619
Black	48,653	32,019
American Indian, Eskimo or Aleutian	21,041	14,040
Asian or Pacific Islander	3,455	2,448
Other	175	72
TOTAL HOUSING UNITS	182,989	
CENSUS BLOCKS COUNTED	7,107	
AREA IN SQUARE KILOMETERS	1,815.792	
AREA IN SQUARE MILES	701.081	

EXHIBIT E-7B
1990 U.S. CENSUS DEMOGRAPHICS
WITHIN KTFX(FM) CLASS C2 60 dBμ SERVICE CONTOUR

Music Sound Radio, Inc.
Sand Springs, Oklahoma
June 1996

DEMOGRAPHICS	POPULATION WITHIN 60 dBμ CONTOUR	
	TOTAL	PERSONS 18+ YEARS
TOTAL POPULATION	679,793	497,429
RACE		
White	568,315	425,123
Black	56,376	36,787
American Indian, Eskimo or Aleutian	43,214	27,704
Asian or Pacific Islander	6,556	4,446
Other	5,332	3,369
HISPANIC ORIGIN AND RACE		
Hispanic	14,242	8,874
NOT OF HISPANIC ORIGIN		
White	560,711	420,319
Black	55,846	36,479
American Indian, Eskimo or Aleutian	42,338	27,292
Asian or Pacific Islander	6,369	4,343
Other	287	122
TOTAL HOUSING UNITS	297,740	
CENSUS BLOCKS COUNTED	13,435	
AREA IN SQUARE KILOMETERS	8,478.856	
AREA IN SQUARE MILES	3,273.705	

AFFIDAVIT

State of California)
) **ss:**
County of Orange)

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

Date: June 14, 1996

Lawrence L. Morton, P.E.

On June 14, 1996, before me, Nancy A. Chase, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

My Commission expires 11/30/96

Notary Public

OFFICIAL SEAL
NANCY A. CHASE
Notary Public California
ORANGE COUNTY
My Comm. Expires Nov. 30, 199

CERTIFICATE OF SERVICE

I, Tracey S. Westbrook, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that a true copy of the foregoing "Counterproposal" was sent this 17th day of June, 1996, by U.S. first class mail, postage prepaid, to the following:

John F. Garziglia, Esquire
Pepper & Corazzini, L.L.P.
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006
(Counsel to Tri-Mac Broadcasting)

Tracey S. Westbrook